

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
)
v.) CRIMINAL NO. 05-30017-MAP
)
CARLOS MARRERO)

MOTION TO CONTINUE STATUS CONFERENCE

Defendant, Carlos Marrero, moves that the Court continue the status hearing in this matter, presently scheduled for July 25, 2006, to a date convenient to the Court but no earlier than August 8, 2006. As reasons therefore, defendant through counsel states that he is on trial before Judge F. Dennis Saylor in United States v. Samuel Lewis, Criminal No. 05-40001-FDS, a matter that is expected to last for at least six more trial days. Counsel will thus be unable to appear for the status conference. Counsel requests a continuance of at least two weeks so that he may finish the Lewis trial and consult with the Assistant U.S. Attorney in this matter in order to make a reliable report to the Court concerning the status of the case.

Due to time constraints, counsel was unable to obtain the assent of Assistant U.S. Attorney Todd Newhouse prior to filing this motion. Defendant agrees that the time between beginning July 25, 2006 up to and including the date of the rescheduled status conference is excludable from Speedy Trial Act calculations.

CARLOS MARRERO
By His Attorney,

/s/ Timothy G. Watkins
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CERTIFICATE OF SERVICE

I, Timothy G. Watkins, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on July 24, 2006.

/s/ Timothy G. Watkins
Timothy G. Watkins